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Virtus Commercial, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KATIE LYNN PACHECO, an individual,

Plaintiff,

v.

VIRTUS COMMERCIAL, LLC, doing business
as a Nevada Limited Liability Company,

Defendant.

Case No. 2:22-cv-01138-RFB-BNW

**STIPULATION TO EXTEND
DEADLINE TO FILE REPLY IN
SUPPORT OF MOTION TO
PARTIALLY DISMISS PLAINTIFF'S
AMENDED COMPLAINT (ECF NO. 3)

(FIRST REQUEST)**

Plaintiff Katie Lynn Pacheco ("Plaintiff") and Defendant Virtus Commercial, LLC ("Defendant"), by and through their respective counsel of record, hereby stipulate and agree that Defendant shall have an extension of time up to and including **September 6, 2022**, in which to file a reply in support of its Motion to Dismiss Plaintiff's Complaint (ECF No. 3) (filed on July 25, 2022). This Stipulation is submitted and based on the following:

1. Plaintiff filed her Amended Complaint (ECF No. 1-5) in the Eighth Judicial District Court, Clark County, Nevada on July 8, 2022. Defendant removed the action to this Court on July 18, 2022 and filed a Motion to Partially Dismiss Plaintiff's Amended Complaint (the "Motion") on July 25, 2022. ECF Nos. 1, 3. Plaintiff filed an opposition to the Motion on August 22, 2022 (the "Opposition"). ECF No. 7.

1 2. The deadline for Defendant to file a reply in support of its Motion (ECF No. 3) is
2 currently August 29, 2022, one week from the date the Opposition was served. However,
3 Defendant's counsel is required to prepare and appear for a mediation this week and needs
4 additional time to address the arguments of Plaintiff's Opposition. Due to this and the obligations
5 of Defendant's counsel in other matters, the parties have agreed to extend the time for Defendant
6 to file a reply in support of its Motion to Dismiss (ECF No. 3). Thus, Defendant shall have up to
7 and including **September 6, 2022** to file its reply.

8 3. This is the first request for an extension of time for Defendant to file its reply in
9 support of its Motion to Dismiss.

10 4. This request is made in good faith and not for the purpose of delay.

11 Dated this 26th day of August, 2022.

12
13 MULLINS & TRENCHAK,
14 ATTORNEYS AT LAW


15 /s/ Philip J. Trenchak
16 PHILIP J. TRENCHAK, ESQ.
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22 /s/ Hilary A. Williams
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ORDER

IT IS SO ORDERED:

23 
24 RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE
26 DATED this 29th day of August, 2022.